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ABSTRACT

The amended guidelines for Title I of the Elementary and Secondary Education act, as revised by the Oregon Department of Education, are presented in this document. It consolidates instructions for completing applications. The purpose of Title I is explained briefly. The first two steps prior to applying are to identify the project target area or areas, and to make a comprehensive survey of the special educational needs of educationally deprived children. After needs have been identified, a study should be made of the reasons why such needs exist. It is at this point that objectives of a project can be enumerated. The objective should be limited to assure concentration of effort and clear understanding by all those taking part. After the program objectives are outlined, activities and services can be planned. The regulations and criteria require that the needs of nonpublic school children living in the project area be appraised in consultation with persons who know the needs of those children. Regulations also require that parent advisory councils be established to advise in the planning for, the implementation of, and the evaluation of such programs and projects. This document also explains the fiscal and accounting provisions accounting for revenue and expenditures. Also outlined are guidelines of the Local Educational Agencies' responsibilities. These guidelines address areas such as: state advisory groups, allocation, size, scope and quality of projects, the comprehensive student needs assessment, pupil support services, and project staff. (Author/AM)

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GUIDELINES

for

TITLE I

Elementary and Secondary Education Act (ESEA)

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INTRODUCTION

Guidelines for Title I, ESEA (P.L. 89-10), as amended, have been revised by the Oregon Department of Education in order to improve the administration of this program. Local education agency personnel responsible for management of Title I activities should study the new guidelines carefully prior to developing a project proposal. These guidelines replace any previously issued; *outdated guidelines should be discarded*.

Administrative responsibility for Title I is assigned to the Compensatory Education Section of the Department. Local educational agencies submit their annual program applications to this section for approval. Following approval of the application, the Department authorizes payments to the local educational agency.

Generally speaking, all educationally deprived children who reside in an eligible attendance area may receive benefits under ESEA Title I. However, funds will be concentrated on those children who, on the basis of a comprehensive assessment, show the greatest need for assistance. Title I funds cannot be used in projects designed to serve the needs of a total school district or a specified grade level in a school. Title I funds must be focused on a limited number of programs and projects and applied to a limited number of educationally deprived children in a manner which shows reasonable promise of promoting a marked degree of improvement in the educational growth of such children.

Participating school districts must establish eligible attendance areas, according to procedures described in these guidelines. Applicant districts must then identify and rank the number of educationally deprived children by attendance area and severity of educational need.

The Statement of Assurances signed by authorized representatives of applicant agencies should be carefully read before signing. It constitutes assurance to the state and federal governments that the agency has read and understands all pertinent laws, regulations and guidelines and assumes full responsibility for proper administration and operation of the grant.

PART I

APPLICATION CRITERIA

AND DEFINITIONS

APPLICATION CRITERIA AND DEFINITIONS

Numerous guidelines and policies for Title I, ESEA programs have evolved since the act was established. This document consolidates instructions for completing applications and the policies that relate to each item on the application form. The *Federal Register of Regulations for Title I, ESEA*, will remain a separate document for reference.

Purpose of Title I, ESEA

When Congress established the Elementary and Secondary Education Act on April 11, 1965, the purpose of the act was described as follows:

> "In recognition of the special educational needs of children of low-income families and the impact that concentrations of low-income families have on the ability of local educational agencies to support adequate educational programs, the Congress hereby declares it to be the policy of the United States to provide financial assistance (as set forth in Title I) to local educational agencies serving areas with concentrations of children from low-income families to expand and improve their educational programs by various means which contribute particularly to meeting the special educational needs of educationally deprived children."

Title I, ESEA provides aid to school districts to develop special programs to improve opportunities for educationally deprived children from low-income attendance areas.

Under this title, funds are available for supplemental education for children of migrant workers and training for teachers of migrants. State law also provides for summer programs for migrant children, giving them instruction in subject areas where they need special help. Funds have been spent for instructional salaries and supplies, transportation and equipment. Other amendments to Title I, ESEA, provide special funds for the handicapped and neglected and delinquent.

Title I, ESEA Application – Where to Begin

Grant application forms are available through the Oregon Department of Education.

Before any attempt is made to prepare the application, certain basic steps should be taken. This should result in an effective, smooth-functioning program.

1. Identify the Project Target Area or Areas

The act provides financial assistance to local educational agencies (LEAs) serving areas with concentrations of children from low-income families. Regulations require that LEAs locate project centers in attendance areas with a concentration of children from low-income families. The section on criteria, (page 4) provides information concerning the selection of target attendance areas.

2. Make a Comprehensive Survey of the Special Educational Needs of Educationally Deprived Children

It is implied in Title I, ESEA that children from low-income families are educationally deprived because of their economic and cultural background. However, none of the educationally deprived children in need of the special educational services provided shall be denied participation in the project on the grounds that they are not children from low-income families.

The population target for project activites should be limited to children educationally deprived to the greatest extent.

Each project must be tailored to meet one or more of the special educational needs of these children and should not be designed merely to meet the needs of schools or of the student body at large in a school or in a specified grade in a school.

In making the survey of special needs of educationally deprived children, use the district's testing and other data and teachers' judgment, and invite the local parent council and other governmental agencies such as health and welfare agencies to participate. When surveying needs, the local educational agency also should include personnel from nonpublic schools so that nonpublic school children who live in the project area may receive comparable consideration.

More information regarding needs assessment is provided in greater detail elsewhere in these guidelines.

3. State a Limited Number of Objectives

Project objectives should be directly related to the stated special needs of a limited number of educationally deprived children served. After needs have been identified, a study should be made of the reasons why such needs exist. At this point, objectives of a project can be enumerated. The objectives should be limited to assure concentration of effort and clear understanding by all those taking part, and to give a reasonable chance of evaluating the activities at the conclusion of the project.

4. Plan Activities and Services

After educationally deprived children have been identified, their needs have been delineated, and program objectives outlined, activities and services may be planned. No project will be regarded as designed to meet the needs of educationally deprived children unless funds made available for that project are used to **supplement**, rather than **supplant**, state and local funds. Projects should have sufficient size, scope, and quality to give a reasonable chance of success. If a local educational agency has a small entitlement, it should make an effort to plan a cooperative project with a neighboring school district.

A cooperative project must have common goals, and the result of cooperation should provide activities and services to a greater extent than could be accomplished without cooperating. To assure size, scope and quality of projects, the required project expenditure per child should equal approximately one-half the expenditure per child from state and local funds for the applicant's regular school program. The applicant must be fully acquainted with the limitations on project expenditures, including limitations on construction and equipment. The bulk of expenditures is normally in personnel and other expenses of instruction.

Consultation With Nonpublic School Officials on Program Planning and Reporting

Regulations and criteria require that the needs of nonpublic school children living in the project area be appraised in consultation with persons who know the needs of those children. Accordingly, private school officials should be involved in this process. The same nonpublic school officials should be consulted concerning the evaluation of the current programs for nonpublic school children and the implications of that evaluation for the program for the following year.

The authorized representative in each reporting district is required to complete an Annual Title I Statistical Report. He must certify that he has disclosed to the appropriate school officials the information provided on the form concerning the participation of children enrolled in his district. If there has been continuing consultation between LEA and nonpublic school officials, it should be found that there is substantial agreement concerning the data. In any event, the private school officials should know what is being submitted and should have sufficient time to comment, if necessary, before the report is submitted.

The free exchange of statistical information and consultation on the evaluation of local programs between public and private school officials is essential to the proper administration of Title I programs.

Parent Advisory Councils in the Title I, ESEA Programs

The law requires that school districts receiving Title I funds establish parent advisory councils and give them the responsibility to advise in the planning for and the implementation and evaluation of such programs and projects. The purpose of the advisory councils is to encourage parental involvement at the local level as an important means of increasing the effectiveness of programs under Title I.

The parent advisory council does not determine program policy nor make administrative decisions per se, but should be given adequate opportunity to make recommendations concerning the operation of Title I, ESEA projects.

School districts are required to provide the following resources and services to parent advisory councils:

- Each council member should be furnished with copies of federal and state Title I, ESEA guidelines, state administrative bulletins and other guidelines and information related to Title I.
- Council members should receive appropriate orientation materials and training to assist in carrying out their functions.
- Each council should be provided with a copy of the school district's current application and be given the opportunity to express its views concerning the application before submission to the Oregon Department of Education for approval.
- Each council shall be given adequate time and opportunity to consider the student needs assessment information and to make recommendations concerning those needs which should be addressed through the Title I program and similar programs.
- Councils should have an opportunity to review evaluations of past and present Title I, ESEA programs.

The parent advisory council should be organized to perform its tasks and may need to consider establishing bylaws, designating officers, developing subcommittees, etc. At present, the requirements do not specify how to organize a council: only that a chairperson be designated and school personnel be considered in an "ex officio" or resource role.

The regulations specify that the parent advisory council should be composed of a majority of parents of children to be served or now being served by a Title I program.

At a minimum, a parent advisory council can satisfy the requirements of the law by holding four meetings during the year:

1. A meeting to review the past year's Title I accomplishments and become familiar with the current program activities.
2. Organizational session to include new council members and orientation to Title I, ESEA regulations.
3. Needs assessment meeting to review information and make recommendations to school district concerning future Title I projects.
4. A meeting to formally review the proposed Title I application for next year.

APPLICATION CRITERIA

Although this document is not designed to supplement the Federal Register of Regulations for Title I of the Elementary and Secondary Education Act, criteria issued by the U.S. Department of Health, Education and Welfare (HEW) for applying for ESEA grants are reproduced on the following pages.

The information provided in the following section was issued by U.S. Commissioner of Education Harold Howe II on March 18, 1968, in Program Guide Number 44.

Final Rules and Regulations were issued in the September 28, 1976, Federal Register. Where a conflict arises between the new rules and Program Guide 44, the Federal Register takes precedence. Program Guide 44 is reproduced here to serve as a quick guide to the important elements of the application process. Where possible, conflict areas have been eliminated.

Title I of the Elementary and Secondary Education Act of 1965 requires that the state educational agency make certain determinations "consistent with such basic criteria as the commissioner may establish . . . ."

These determinations must be made with respect to: selection of project areas; size, scope, and quality of projects and their potential for meeting the needs of educationally deprived children; participation of children enrolled in private schools; coordination of Title I program with other programs having the same objectives; dissemination of information; methods and procedures for evaluating the results of the program; and the training of education aides.

The following criteria, based on the law and regulations, were formulated to illustrate essential characteristics of an approvable Title I program. Each criterion is stated as an affirmative "finding" and is followed by an explanation of some of the factors to be considered in developing a program.

Each educational agency should review its program to be sure that none of these criteria has been overlooked before submitting an application to the state educational agency for approval.

The state educational agency will review the application and advise the applicant which criteria, if any, have not been met. Unless the state educational agency finds that each criterion has been met, the application may not be approved.

1. THE SELECTION OF ATTENDANCE AREAS FOR TITLE I PROJECTS

1.1 The attendance areas selected for Title I projects are those areas which on the basis of the best available information have high concentrations of children from low-income families.

Authority: 20 USC 241e(a)(1)

Section 105(a)(1) of Title I requires that projects be designed to meet the needs of educationally deprived children living in school attendance areas with high concentrations of children from low-income families. By regulation, the attendance areas with high concentrations of children from low-income families are those areas where the concentration of such children is as high as, or higher than, the average concentration for the district as a whole.

An "attendance area," for the purposes of Title I, is an area served by a public school. For each such attendance area data must be secured on (a) the total number of children who according to their ages are eligible to attend the public school serving that area and (b) the number of such children who are from low-income families.

In making this determination it is not necessary for the LEA to use a particular income level but the same level should be used for all attendance areas.

In some cases income data are not available or are out-of-date and the number of children from low-income families will need to be estimated on the basis of the number of such children who are in families receiving Aid to Families with Dependent Children (AFDC), or who are receiving free lunches. Housing, health, or employment statistics may also be used in estimating the number of children from low-income families in each attendance area. Whatever data are used must be used uniformly throughout an applicant's district.

Normally, the attendance units should be ranked according to the percentage of children from low-income families. However, in districts with extremely large variation in the sizes of the populations of its attendance units, such units may be ranked according to the average number of children per attendance unit. If necessary, for reasons of equity, the attendance units determined to have high concentrations of children from low-income families may include some areas ranked on one basis and some on the other. In such a case, however, the total number of attendance areas accepted as eligible areas for Title I purposes should not exceed the number of such units that would have been eligible if only one basis (i.e., percentage or average number of children from low-income families) had been used.

Elementary and secondary school attendance areas in the same school district may be ranked separately on the basis of the percentage or numerical concentrations of children from low-income families among the children eligible to attend such schools.

In all cases, the number of children considered eligible to attend a particular school consists of all children of the appropriate ages, including children attending private schools and children who have dropped out of school.

In some cases, a whole school district or a group of contiguous school attendance areas may be regarded as a single area of high concentration of children from low-income families. This may be done, however, only if there are no wide variances in the concentrations of children from low-income families.

Some schools have no well-defined attendance area boundaries or receive numbers of children from outside the areas that have been designated for those schools. It may be necessary to base the ranking of the attendance areas for such schools on the percentage or number of children from low-income families actually **enrolled** in those schools. Other children, as explained below, will be included in the "target population," if the area is found to have a higher than average concentration of children from low-income families.

The purpose of the attendance area requirement is to identify the "target populations" of children who are to be considered for participation in Title I activities on the basis of educational deficiency and need for special services. For schools without well-defined boundaries or where children have been transferring in or out on open enrollment or freedom-of-choice plans, the "target population" should include: (a) all of the children who are attending the particular public school, which on the basis of enrollment, has a high concentration of children from low-income families; (b) children who have been attending that school; and (c) children who would be attending that school if they were not attending a private school or another public school under a freedom-of-choice, open enrollment, or another plan designed to bring about desegregation.

2. COMPREHENSIVE ASSESSMENT OF NEEDS

2.1 The priority needs of educationally deprived children in the eligible attendance areas (target populations) were determined in consultation with teachers, parents, private school authorities, and representatives of other agencies which have a genuine and continuing interest in such children. The evidence of need and the bases for the assignment of priorities have been documented.

Authority: 20 USC 241e(a)(1)

The term "educationally deprived children" has been defined in the Title I regulations as:

> ". . .those children who have need for special educational assistance in order that their level of educational attainment may be raised to that appropriate for children of their age. The term includes children who are handicapped or whose needs for such special educational assistance result from poverty, neglect, delinquency, or cultural or linguistic isolation from the community at large." [45 CFR 116.1(i)]

The first step in the development of a compensatory program to meet the needs of such children is to evaluate the evidence concerning the educational deficiencies of children who live in the eligible attendance areas. If necessary, additional evidence should be secured before extensive programming is undertaken. The evaluation of the previous year's Title I program often provides considerable information concerning the educational deficiencies of children in the areas where Title I projects have been conducted. Specific attention should be given to the information available on educational retardation, results of educational tests, linguistic or racial isolation, welfare and nutrition, physical and mental handicaps, and other pertinent information on which the incidence and severity of the needs of children in the project areas can be established.

It is essential that public and private school teachers and other staff members, parents, and representatives of related programs and agencies be involved in the early stages of program planning and in discussions concerning the needs of children in the various eligible attendance areas. They are often able to corroborate or offer insights concerning the evidence of educational deficiencies. They will be much more likely to lend support to a program of special educational services if, as a result of their involvement, they understand the premises on which such a program is based.

Officials of community action, welfare, juvenile protection, and other agencies which have responsibilities for helping people—children or adults—overcome the effects of poverty are among those to be consulted concerning their views on the needs of the children in eligible attendance areas.

The objective of the consultations concerning the educational needs of children in the eligible attendance areas should be the development of a carefully documented list of needs in order of priority for the following groups of children:

Preschool Children

The general need for early diagnosis and for compensatory educational services for preschool children in predominantly low-income areas is widely recognized. Many of these children, while yet without regular school experience, already show a lack of intellectual and social growth. Unless they can be motivated and stimulated, they are not likely to experience much success in their first years in the regular school program.

The applicant should definitely consider the needs of preschool children in planning its Title I program. Opportunities for children to participate in Project Head Start should be fully explored with the local community action agency, and full advantage should be taken of the availability of this resource. Where Head Start funds are not available or are insufficient, the applicant should give priority consideration to meeting the needs of preschool children through the use of Title I funds or, if possible, through the coordinated use of Head Start and Title I funds.

Community action groups are often interested in programs for preschool children, particularly if they are involved, or have been involved, as grantee agencies for Head Start programs funded under the Economic Opportunity Act of 1964. Every effort should be made to assist such groups to secure Head Start grants and thus reduce the demand for similar programs under Title I. In highly impoverished areas a community action agency may be able to provide health and welfare services for preschool children on the basis of financial need, while the school-oriented program for all of the children of preschool age living in that area is provided under Title I.

Where day care centers have been established for children in families receiving Aid to Families with Dependent Children (AFDC), the local educational agency, in consultation with the Head Start program grantee, should explore the possibility of adding needed educational components to the programs to be conducted in those centers.

Children in Early Elementary School

The needs of children in the early elementary school grades should be carefully assessed. These children already manifest in their behavior the intellectual and social deprivation that has characterized their lives. There is

considerable evidence that special programs can be helpful for educationally deprived children in those grade groups. The development of such a program will require a careful assessment of the particular characteristics, behavioral patterns, and needs of the children who live in the applicant's eligible attendance areas.

Applicants should identify the needs of children in the early elementary school grades to preserve and build on progress they may have made in Head Start and Title I preschool classes. The applicant should give priority consideration to such children in the Title I program in order to avoid interruption of needed enriched services which they had been receiving under Head Start or other quality preschool programs. Applicants should be encouraged to consider programs of instruction and services outlined in the criteria for the Follow Through program to assure that sequential learning experiences are made available to children based on preschool and kindergarten preparation for cognitive growth and development.

Children in Later Elementary School and Secondary School Years

It is in the later elementary and secondary school years that educational deficiencies become most apparent and most difficult to treat. By this time many of the children are no longer responding in any positive way to their school environment and are well on their way to becoming dropouts. Their academic and behavioral problems are extremely varied and complex and will require the most careful study in order to establish the needs on which an effective compensatory program can be developed. Remedial programs should be built on a thorough consideration of the potential of individualized instruction, tutoring, and personalized guidance services.

Dropouts

The needs of children who have actually dropped out of the regular school program should also receive specific attention. With the help of other agencies, these children should be located and identified, and every effort should be made to evaluate their educational needs in order to provide a sound basis for the planning of special educational programs to meet those needs.

Children in Institutions

Children in institutions for the neglected or delinquent who have been counted in determining the applicant's allocation, even though they may not be living in an eligible attendance area, are to be considered as eligible for participation in Title I projects. Opportunities should be provided for the participation of such children in services designed to meet their needs.

Handicapped Children

The unmet needs of handicapped children should be considered. It is expected that such children will be included in Title I programs in project areas where the existing level of services for such children is recognized as being inadequate. Diagnostic procedures should be required as a part of all service programs for these children. Coordination with Title VI, ESEA, programs must be demonstrated.

Non-English Speaking Children

Every applicant should be aware of the needs of non-English speaking and bilingual children who live in the eligible attendance areas. Special efforts should be made to meet the needs of these children through Title I or through another program in order that they may learn to participate fully in the life of their community. The strengths of their ethnic backgrounds should be utilized in the development of special programs related to their needs.

The needs of the children in each of the foregoing groups should be stated in behavioral terms and, when appropriate, with reference to objective measures of educational growth or achievement. These needs must be set forth on the Title I application in order of priority.

3. PLANNING

3.1 The Title I program was planned as an integral part of a comprehensive compensatory educational program involving the coordinated use of resources from other programs and agencies.

Authority: 20 USC 241e(a)(1) and 883 (c)

While the authority of Title I is directed solely toward the special needs of educationally deprived children, there are other programs and agencies which are also authorized to provide services to meet some of those same needs. It is important, therefore, when the priority needs of the children have been determined, that the various other agencies and program representatives be aware of those needs, particularly with respect to needs for improved nutrition, treatment and prevention of diseases and disabilities, and other needs indirectly related to the educational process.

Program representatives in the local educational agency and in the other interested agencies should develop the broad objectives for the comprehensive compensatory educational program. Once these objectives have been agreed upon, consultations should begin on the organization and utilization of all available resources to realize these objectives. This will require careful examination of the authority and responsibility of each of the various agencies. Each agency, however, should explore how it can most effectively, within its authority and responsibility, contribute to the realization of the objectives of the compensatory educational program.

Many of the other agencies involved in assessing the needs of children have been serving children and parents in various ways and may be receptive to new ideas about how their services can be more effective. If these agencies have new funds or are reprogramming the use of existing funds, it is very important that this be made known to the local public school authorities so that Title I funds are not inadvertently programmed for the same purposes.

The local educational agency itself should also examine the possibility of using other federal grant programs, such as other titles of ESEA, NDEA, and EPDA, to meet the needs of children in the project areas. For some local educational agencies additional state funds or private funds may be available for this purpose. The Title I application should provide information concerning related programs and the specific provisions that will be made for coordination.

Some of the other agencies may have to follow economic criteria with respect to the selection of children and families for services, whereas the local educational agency must use educational criteria in selecting children from among those who live in areas that meet required economic criteria. Many of the same children, however, will be found to be in need of services on grounds of both economic and educational deprivation. Under these circumstances it is important that the agency with the major responsibility and the best resources deliver each of the needed services in coordination with, but without duplicaton of, the work of the other agencies.

Some program objectives, therefore, will be the primary responsibility of the local Title I program; others will fall to other federal (direct grant or state plan) programs to be conducted by the local educational agency, to the federally financed programs of other educational agencies, or to various state and local programs and, in some cases, to private agencies. If a model cities program or a neighborhood services center is in operation or is being planned, the appropriate program representatives should be consulted concerning the need for the coordination of their programs with the compensatory education program.

The Title I application should present sufficient information to show that the resources available to the local educational agency and to other local agencies have been considered in planning the program, and that, where appropriate, those resources have been committed to certain program objectives.

The application should show not only that the resources of other programs were considered in planning but also that there will be appropriate coordination of related services in the actual operation of a comprehensive program.

4. PROGRAM DESIGN

4.1 Consideration has been given to the relationship of the Title I program to the regular school program, and to the possibility of modifying that program to provide a better base for the addition of supplementary compensatory educational services.

Authority: 20 USC 241e(a)(1)

Probably the most obvious indication of a child's need for special educational assistance under Title I is his/her inability to respond constructively to the regular school program. In many cases this program can be modified and integrated with the services to be provided under Title I to provide children with a total program adapted to their special needs. In this connection, the requirement that applicants maintain regular school programs in the project areas at the same levels as they would have been maintained if Title I funds were not available applies only to expenditures and not to the program itself.

The Title I program, if it is to be truly supplementary, must be designed to extend and reinforce the regular school program. Insofar as possible, the regular school program, the Title I program, and any other special programs should be designed as a total program to meet the needs of the children to be served. This may require revision of the regular school curriculum. Communication also will be required between regular school and Title I staff concerning their respective programs, and the ways in which they can be improved to better meet the needs of the educationally deprived children involved in both programs.

4.2 The application shows that the Title I program is based on a consideration of the relative needs of children at all ages and grade levels and is designed to meet a limited number of high priority needs which cannot be met through the regular school program or other programs.

Authority: 20 USC 241e(a)(1)

Title I resources should be concentrated on those children who are most in need of special assistance. Normally, this process will involve determinations of both the needs of individual groups of children and of the possibilities for success in working with those groups. Decisions should be made in terms of the effectiveness of providing comprehensive services to a limited number of children in a few groups as opposed to the ineffectiveness of spreading diluted services over all eligible children in all groups. Consideration must also be given to the availability of assistance from other agencies and programs for specific groups of children.

4.3 The Title I program is based on clearly stated objectives and desired outcomes and, if executed as planned, will very likely result in reduction of educational deficiency.

Authority: 20 USC 241e(a)(1)

The compensatory education objectives to be met through Title I should be clearly and realistically stated in terms of the types of changes that are sought and the degree of change that is expected by the end of the year as a result of each major activity. Where appropriate, reference should be made to evaluations of similar activities carried on during preceding years, the program changes that have been made as a result of such evaluations, and the types of improved performance expected by the end of the new program year. As applicants gain experience they should become more precise concerning what they expect to accomplish through their Title I programs.

4.4 Due consideration has been given to the provisions of Title I services not only during the regular school year but also during the summer.

Authority: 20 USC 241e(a)(1)

Applicants should examine closely the possibility for meeting urgent needs through summer programs. The summer period provides opportunities for new activities which, while designed to overcome educational deficiency, can be more specifically and extensively adapted to the needs of the children to be served. Special efforts should be made, however, to be sure that the children who participate receive assistance designed to continue the gains they have made in the preceding school year or to prepare them for the next school year's activities under the regular school or the Title I program.

4.5 Educationally deprived children enrolled in private schools will have genuine opportunities to participate in the Title I program on the basis of need, as determined by the comprehensive assessment of the needs of all children in the eligible low-income areas. The high priority needs of private school children

residing in those areas will be met with services that are comparable in scope and quality to those provided to meet the high priority needs of public school children.

Authority: 20 USC 241e(a)(2)

The applicant's assessment of needs of children at various grade and age levels must include the children in the eligible public school attendance areas who are enrolled in private schools. This assessment is to be carried out in consultation with private school authorities and to provide the basis for: (a) determining the special services in which private school children will have genuine opportunities to participate, and (b) selecting the private school children for whom such services are to be provided.

The needs of private school children in the eligible areas may not be identical with those of public school children and, therefore, may require different services and activities. Those services and activities, however, must be comparable in quality, scope, and opportunity for participation to those provided for public school children with needs of equally high priority. "Comparability" of services should be attained in terms of the numbers of educationally deprived children in the project area in both public and private schools and related to their specific needs, which in turn should produce an equitable sharing of Title I resources by both groups of children.

The application should provide sufficient evidence to assure the state educational agency that the local educational agency will maintain administrative direction and control over Title I activities conducted on private premises. Title I instructional activities and related services, the use of equipment, and all personnel performing services on private premises under the Title I program are to be under the active supervision of the applicant local educational agency.

4.6 The applicant's Title I program will be conducted in a limited number of eligible attendance areas and will provide relatively higher concentrations of services in areas having the highest incidence of poverty.

Authority: 20 USC 241e(a)(1)

The applicant should make sure that the needs of children in eligible areas with the highest incidence of poverty have been met before considering the needs of children in eligible areas in which the incidence is much lower. The program in the areas with the highest incidence should be designed to serve a larger proportion of children and to provide them with a greater variety of services than programs in areas with lesser incidences of poverty.

4.7 Title I services will be programmed so that those services will be concentrated on a limited number of children.

Authority: 20 USC 241e(a)(1)

The Title I program, if it is to have "sufficient size, scope and quality to give reasonable promise of substantial progress," as required by the Act, must be concentrated on a limited number of children. Furthermore, it should be expected that each child will need not a single service but a variety of services which should be provided under Title I and, if possible, through other agencies.

The proposed Title I expenditure per child is an indication of the concentration of effort. The greater the concentration of effort, as indicated by investment per child, the greater the likelihood that the program will have a significant impact on the children in the program. The investment per child on an annual basis for a program of compensatory educational services which supplement the child's regular school activities should be expected to equal about one-half the expenditure per child from state and local funds for the applicant's regular school program. The investment per child per year for a program such as a preschool program which provides all of the services for the child involved should be expected to equal the applicant's full expenditure per pupil from state and local funds.

5. IMPLEMENTATION OF TITLE I PROGRAMS

5.1 The proposed staffing pattern is appropriate for the activities and services to be provided.

Authority: 20 USC 241e(a)(1)

The ratio of project staff to the number of children to be served should be high enough to provide concentrated, individualized services. Use should be made of a variety of personnel other than professional classroom staff. Parents of participating children, volunteers, and persons in the community with special skills should be considered in the selection of the staff needed to provide the specified services.

5.2 In-service training will be geared specifically to the requirements of the Title I program and the needs of the Title I staff.

Authority: 20 USC 241e(a)(1)

The orientation, indoctrination, and development of the personnel who have been selected to conduct the Title I program is probably the most critical phase of the Title I program. The concentration of the Title I program on children who have not been developing satisfactorily under the regular school program indicates the need for new approaches to the development of teaching and other personnel.

The methods of preparing personnel to undertake specific Title I activities and for their continued in-service development should be closely geared to those activities. Furthermore, the in-service training program should be of sufficient size and depth to have an impact on the participant and the Title I program. Case studies of other ongoing programs "sensitivity" training, and other approaches specifically designed to help teachers do a better job of providing special services for and relating to children with special needs should be tried and evaluated. Institutions of higher education should be involved in conducting training programs for Title I personnel and in following up with the evaluation of those programs. The use of old ready-made courses not related to problems confronting the Title I staff should, of course, be avoided.

5.3 Specific provision has been made for professional staff members and education aides assigned to assist them to participate together in coordinated training programs.

Authority: 20 USC 241e(a)(11)

The 1967 amendments to Title I specifically require, as a condition for the approval of projects involving the use of education aides, the presentation of well-developed plans for training programs in which the aides and the professional staff members they will assist participate together. The program provided for such staff members and their aides should, as stated in item 5.2, In-service Training, be closely allied to the tasks they will be performing. Each Title I application involving the use of education aides should set forth: (a) definite proposals for the joint training of those aides and the professional staff members with whom the aides will work, or (b) a detailed description of such a program in which most of the aides and the professional staff members they will assist have already participated. Special attention should be given to the development of the most effective ways the professional staff members and their aides can work together and of ways in which a long-term training program may assist both professional staff members and aides to take on increasing responsibilities. If appropriate, consideration should be given to providing the aides with training leading toward teacher certification. Such training may begin with Title I funds and continue as long as the aides are employed in Title I activities. After this, other appropriate funding should be sought.

5.4 The Title I program includes appropriate activities or services in which parents will be involved.

Authority: 20 USC 241e(a)(1)

The applicant should demonstrate that adequate provision has been made in the Title I program for the participation of and special services for the parents of children involved in the programs. The employment of parents in the Title I projects is but one way to implement this provision. The primary goal of such activities and services should be to build the capabilities of the parents to work with the school in a way which supports their children's well-being, growth, and development.

5.5 Title I activities or services will be offered at locations where the children can best be served.

Authority: 20 USC 241e(a)(1)

All Title I program activities must be designed for educationally deprived children who live in eligible attendance areas but should be offered at locations where those children can best be served. Any proposed Title I activities (including the construction of school facilities) which, because of location or for other reasons, would in effect prolong the racial, social, or linguistic isolation of the children to be served would be self-defeating and should not be approved. Applicants for Title I funds should design effective compensatory education programs which include, where appropriate, measures for fostering integration in the community.

In some cases, the locations where the children can best be served will be outside the project area. The application should indicate clearly the locations both inside and outside the project areas where Title I

services will be offered and the number of children from inside and outside the project areas who will participate at each such location.

No child who lives in a project area and who would otherwise receive Title I services is to be denied such services because of his exercise of a right to enroll in another school. Children residing outside the project areas who can benefit from the services may participate on a space-available basis.

5.6 Expenditures for equipment will be limited to the minimum required to implement approved Title I activities or services.

Authority: 20 USC 241e(a)(1)

All requests for the approval of funds for the purchase of initial or replacement equipment must be fully justified. This means that the applicant must show that: (a) equipment has been selected and designated for specific purposes in connection with proposed project activities, (b) the proposed equipment is essential to the effective implementation of the project, (c) such equipment is not available in the applicant's regular or Title I inventories for use in the project, and (d) the applicant has the trained staff to utilize the proposed new equipment effectively or that arrangements will be made to prepare staff for such use. The state educational agency will review existing Title I inventories and insure that equipment already purchased with Title I funds is being effectively used for Title I purposes. Equipment that is no longer appropriate for use in Title I projects should be sold or transferred to the applicant's regular inventory and the appropriate amounts refunded to the federal government.

5.7 Title I funds will be used for construction only when necessary to implement projects designed to meet the highest priority needs of educationally deprived children in the applicant's district.

Authority: 20 USC 241e(a)(1)

Whenever possible, Title I activities and services should be organized and scheduled for operation in existing facilities. If existing facilities cannot be used, consideration should first be given to the rental of space in ready-made, permanent or portable, facilities. Rental or construction of school facilities (including portable units) not specifically related to a Title I project activity should not be allowed except in unusual situations where: (a) such construction is necessary in order to bring children together at locations where they can be served effectively under Title I and (b) the local educational agency is unable to provide such facilities with its own funds. The construction of permanent new facilities should be regarded as a local responsibility except in extreme cases of financial need.

5.8 The Title I program includes provisions for the dissemination of information to teachers and administrators for their use in planning and conducting projects.

Authority: 20 USC 241e(a)(9)

In addition to the dissemination that takes place through in-service training programs for the Title I staff, relevant information concerning compensatory education from such sources as research and demonstration reports should be made available through appropriate forms of communication to Title I and other school personnel serving participating children. Emphasis should be placed on the dissemination of information which will contribute to improved program planning and operation both in the applicant's district and in other districts. Conversely, applicants should be able to demonstrate that their Title I staff members in planning program activities have considered the information that has been made available to them. Applicants should develop information dissemination programs to include involvement of the community and parents of children served by the project. Dissemination procedures should include such things as annual reports, newsletters, news releases and other material for newspapers, magazines, radio, and television for the purpose of informing the public and other educators about program objectives and procedures and to gain support of the project.

6. EVALUATION

6.1 The Title I program includes specific evaluation procedures that are appropriate for the services to be provided and consistent with approved program objectives. Adequate staff and other resources will be provided to implement the procedures.

Authority: 20 USC 241e(a)(6)

The Title I application must include a description of the methods and procedures to be used to evaluate each major activity. No application can be approved unless these procedures are described in sufficient detail to enable the state educational agency to appraise their potential effectiveness.

The application should also contain sufficient information for the state educational agency to determine the adequacy of the resources the local educational agency expects to use in carrying out the evaluation of its major program activities. Private school officials should be involved in the formulation of evaluation procedures for any activity in which private school children are expected to participate.

The adequacy of the applicant's plans and resources for evaluation must be assessed in terms of the objectives that have been approved for the program and the nature of the major activities.

7. TITLE I FUNDS SUPPLEMENTARY TO STATE AND LOCAL FUNDS

7.1 The Title I program and the regular school program have been planned and budgeted to assure that federal funds will supplement, and not supplant, state or local funds and that state and local funds will be used to provide services in the project areas that are comparable to the services provided in nonproject areas.

Authority: 20 USC 240e(a)(1)

It is expected that services provided within the district with state and local funds will be made available to all attendance areas and to all children without discrimination. The instructional and ancillary services provided with state and local funds for children in the project areas should be comparable to those provided for children in the nonproject areas, particularly with respect to class size, special services, and the number and variety of personnel. Title I funds, therefore, are not to be used to supplant state and local funds which are already being expended in the project areas, or which would be expended in those areas if the services in those areas were comparable to those for nonproject areas. This means that services that are already available, or will be made available, for children in the nonproject areas should be provided on an equal basis in the project areas with state and local funds rather than with Title I funds. It is intended also, in the application of this policy, that as services initiated in the project areas under Titl I are extended to children residing in nonproject areas the applicant will assume full support of those services under its regular school budget. This will release Title I funds to provide new activities for eligible children.

DEFINITIONS

The following terms, abbreviations, and definitions are used in these instructions and guidelines and on the application forms and must be understood before attempting to complete the application forms.

FY	–Fiscal Year
LEA	–Local Educational Agency
SEA	–State Educational Agency
USOE (OE)	–United States Office of Education

Activity – A project component designed to meet certain special educational needs of educationally deprived children in an instructional field (such as reading, mathematics, prekindergarten, etc.).

Attendance Area – The geographical area(s) in which the children attending a specific public school reside.

Fiscal Year (FY) – The period beginning July 1 and ending the following June 30. (A fiscal year is designated in accordance with the calendar year in which the ending date of the fiscal year occurs.)

> **Preceding Year** – The fiscal year just ending. It is the year **just completed, prior** to the year for which application is made. In most cases, an application is made before the fiscal year is completed, and since no audited figures are available, an estimate must be made based on the district budget.
>
> **Second Preceding Year** – The second year back, usually the first year for which audited figures are available.

Local Educational Agency (LEA) – An agency, such as a board of education or other legally constituted local school authority, which has administrative control and direction of free public education up to and including grade 12 in a county, township, independent, or other school district.

Project – The set of activities and services described in an application designed to meet special educational needs of educationally deprived children living in a project area.

Project Area – The public school attendance area or combination of public school attendance areas designated in an application as the area in which the educationally deprived children to be served by a particular project reside. Such an area or combination of areas must have a high concentration of children from low-income families.

Service – A project component designed to meet certain related educational needs of educationally deprived children in a supporting field (such as health, guidance and counseling, etc.).

State Educational Agency (SEA) – The agency primarily responsible for the state supervision of public elementary and secondary school (Oregon Department of Education).

Title I (Act) – Title I of the Elementary and Secondary Education Act of 1965, Public Law 89-10, as amended.

PART II

FISCAL AND ACCOUNTING PROVISIONS

ACCOUNTING FOR REVENUE AND EXPENDITURES

FISCAL AND ACCOUNTING PROVISIONS

ACCOUNTING FOR REVENUE AND EXPENDITURES

Monies received and expended under Title I of the Elementary and Secondary Act (ESEA) shall be accounted for in a separate fund(s). The local educational agency (LEA) has the option of depositing Title I receipts in its general fund bank account or in a separate bank account. However, separate accounting records shall be maintained by the LEA for the receipt and expenditure of this money.

Inasmuch as the uses and limitations of these monies are specified by the legal authority establishing same, viz., the federal government, these monies cannot be diverted to other uses. In accordance with the *Program Budget Manual*, published by the Oregon Department of Education in April 1975, monies of this character are to be coded as a subclassification(s) of Code 200 entitled Special Revenue Fund.

It is not enough to provide a single special Revenue Fund account for the Title I project to be administered by an LEA. The federal regulations require that the state education agency must account for funds separately by source of funds and the year in which such funds were approved by Congress. The budget forms and financial reports are preprinted so that the LEA can account for and identify each project by its source and year through use of individual project numbers. The identity of the individual project number is maintained even though it may span parts of two different fiscal years.

It follows that the formal books and accounts of the LEA, or a suitable substitute therefor, should recognize the need to generate figures by project number. Where the LEA uses the formal books and accounts approach, it is a matter of assigning subclass codes to accounts under the fund account assigned to the overall project in the Special Revenue Fund Section. A suitable substitute for the above is a subsidiary record in which the revenues and expenditures are detailed by individual project numbers and kept in agreement with the control account carried in the Special Revenue Fund section of the formal books and accounts.

Classification of revenue and expenditures related to Title I of ESEA shall conform to the accounting structure set forth in the current Program Budget Manual. The obligation basis of accounting shall be used by LEAs in accounting for Title I monies even though the LEA may be on the cash basis of accounting for its normal operations.

Cooperative Projects

For cooperative projects, it is recommended that the administrative LEA use a separate bank account for the deposit of Title I monies. Also separate accounting records must be kept by the administrative LEA. All disbursements should be made by the administrative LEA for services and materials furnished to participating LEAs. No money should be advanced to the participating LEAs by the administrative LEA.

The Starting Date

LEAs may not accrue expenditures against a Title I project before the project application is approved by the Oregon Department of Education, and a starting date is specified in the notice of approval document.

The Initial Budget

An integral part of the application for a Title I grant is the budget. The budget is summarized on the page of the application for grant headed Budget Summary and is detailed by individual project number on the page of the application headed Detailed Total Project Budget. On both pages, the expenditures are labeled in accordance with the expenditure account codes prescribed by the Program Budget Manual.

Recovery of Indirect Costs

By direction of the U. S. Office of Education, after July 1, 1972, LEAs are required to have an approved indirect cost rate in order to recover any indirect (overhead) cost related to federal grants and contracts. Bureau of the Budget Circular A-87, dated May 9, 1968, provides that federally assisted

programs shall bear, in addition to direct costs, their fair share of indirect costs. Circular A-87 establishes uniform principles for determining and distributing costs of federal grants and contracts. These principles are the basis for development of indirect cost allocation plans and rates. The LEA is required to prepare an indirect cost allocation plan only if it wishes to recover indirect costs for federal grants. The LEA has the option of electing not to recover indirect costs.

The office of Grant Administration Policy, U. S. Department of Health, Education and Welfare, has delegated the authority for reviewing LEA indirect cost plan data and for approving LEA indirect cost rates to the Superintendent of Public Instruction or his designated representative. In the performance of this responsibility, the Department has periodically issued instructions setting forth the procedure to be followed by the LEA wishing to take advantage of this provision. The latest copy of the procedure can be obtained from the Business and Auxiliary Services section of the Department.

Revisions of Budget

The initial budget may be revised when a supplemental application is submitted. To do so, the LEA uses the form, furnished by the State Title I office, entitled: Supplemental Application and Instructions for Applying for Title I, ESEA Funds to Expand, Modify or Revise an Approved Project.

When the supplemental application is approved, the revised budget replaces the initial budget.

As the project proceeds, it is not unusual for the actual expenditures to vary somewhat from the details of the individual project budgets. To recognize this, the LEA can ask for a revision in the budget by means of transfers among the approved expenditure accounts with the following understandings. Any transfer of an amount *from* any approved account or *to* any approved account, that exceeds ten percent of either approved account, requires the written approval of the State Title I office. Furthermore, the LEA may not transfer any amount *from* any approved account *to* an account not previously contained in the project budget, without written approval of the State Title I office. To request a revision, submit in duplicate a Detailed Total Project Budget and a Budget Summary, on forms obtainable from the State Title I office, and attach two copies of a letter of justification.

The 3-Purpose Form (Form 3140-Rev. 11-76)

To carry out the requirement that Title I figures must be generated by project number, there has been put into use a 3-purpose form (Form 3140 Revised 11-76) the heading of which always signifies the project number to which it relates. This form, copies of which are carried herein as pages 6 and 7, is used for: Notification of Project Approval, Financial Report and Request for Funds (Quarterly), Financial Report (Final).

The use of the above reports is outlined on page herein headed (Worksheet Copy). Further information and instructions are offered in the following paragraphs:

Notification of Project Approval

The upper third of the 3-purpose form is filled out, approved, and issued to the LEA by the State Title I office immediately upon approval of the original application for a grant. It is also used to notify the LEA of the approval of supplemental additions to the approved project. Copies of these notices are routed to Department Business Services to cause encumbrance records to be originated or revised.

Financial Report and Request for Funds (Quarterly)

The lower two-thirds of the 3-purpose form is not only a financial report for the quarter just passed, but also a request for funds to cover the following quarter. The first such report is submitted to Department Business Services by the LEA at the outset of the project and quarterly thereafter (by calendar quarter) throughout the life of the project. Separate reports are to be completed for each project number.

Financial Report (Final)

After each project is completed, the lower two-thirds of the 3-purpose form is completed and two copies, showing the final total figures for each project

number are submitted to Department Business Services. These totals are used by the Department Business Services for the preparation of overall reports to the U. S. Office of Education on Title I financial activities.

Final detailed figures for each project number are needed by the State Title I office for the purpose of comparing actual expenditures with finally approved detailed budgets. To provide this information the LEA, using Form No. 2321 (1-77) Detailed Final Financial Report, will report at the completion of the project the final actual expenditures for each project number, broken down to major object categories under each program account number.

Comparison Actual Expenditures With Budget

Upon receipt of the Final Financial Report (Detailed), the Department will compare the actual expenditures on each project number with the final approved budget therefor. The State Title I office will then decide what disposition is to be made of any unauthorized cost overruns.

Carry-Over Funds

Title I funds, not fully obligated at the close of the year made available, can be made formally available for obligation in the succeeding year upon submission to the State Title I office of a carry-over request. This request pertains to funds presently in balance in approved projects and/or funds which have not been applied for or approved to date. These carry-over funds cannot be used until the LEA has an approved project for the succeeding year.

Accounting For Equipment

The Act requires that the title to equipment shall be in public agency which will be responsible for administering such property. Perpetual Inventory records of equipment purchased by state and local agencies should be maintained on all items costing $100 or more per unit for the useful life of the equipment or until some disposition of the equipment has been made in accordance with the standards cited below. Inventory records should also include all items of equipment temporarily placed on the premises of or in a private school, regardless of their cost.

Perpetual inventory records may assume any form that the public agency finds practicable; e.g., 5-inch by 8-inch cards, bound ledger, loose-leaf ledger, data processing equipment printout, etc., but must, as a minimum, reflect (1) date of purchase, (2) vendor, (3) description, (4) serial number, (5) cost, (6) current location, and (7) notation if replaced or sold.

Administrative Control of Equipment

Each item of Title I equipment shall remain, throughout its useful life, under the administrative control of the LEA responsible for implementing the Title I project for which it was acquired. However, administrative control may be transferred to another LEA, or may be assumed by the Oregon Department of Education, whenever the Department finds such action is warranted for effective control and use of the equipment.

When the grantee no longer has need for the equipment in any of its Title I projects, the equipment may be used for its own official activities in accordance with the following standards:

- Nonexpendable equipment with an acquisition cost of less than $500 and used for four years or more. The grantee may use the equipment for its own official activities without reimbursement to the Department or may sell the property and retain the proceeds.

- All other nonexpendable equipment (cost over $500 or used less than four years). The district may retain the equipment for its own use provided that a fair compensation is made to the Department. The amount shall be the current fair market value of the property.

Independent Audits of Title I Projects

Records of Title I projects shall be audited in connection with the annual audit of LEA books and accounts as directed in ORS 328.465. The manual entitled, "Minimum Standards for Audits of Oregon Municipal Corporations" most recently published on March 1, 1976, recognizes federal requirements for

audit of Title I, ESEA projects. Special audit considerations are outlined in sections 165-30-240, 165-30-245, and 165-30-445 of the manual. Specific mention is made of the possibility of a need to extend audit procedures to accommodate federal reporting requirements. Section 165-30-455 of the Minimum Standards provides for the extension of audit procedures in such circumstances. The scope of the extended procedures should be clearly set out in the contract with the independent auditor.

One matter that the federal authorities insist be done in the audit of the LEAs is to determine that financial reports and related data are in agreement with and supported by the accounting records. (See 165-30-245)

Effective with the audits of fiscal year 1977, the extended procedures which LEAs should request of the independent auditor should include:

1. Identification of all projects for which there had been submitted to the Department final financial reports bearing dates within the twelve months under review.

2. Verification of the final financial reports to determine that they are correctly prepared and in agreement with the LEA accounting records.

3. Include in the audit reports specific comments relating to the review of the financial reports and indicate if the reports are or are not correct. If any reports are found to be incorrect, comments should be included which identify the discrepancies and make recommendations for corrective action if deemed appropriate.

PART III

LEA Title I Responsibilities

General Guidelines

GENERAL GUIDELINES

The law itself and the criteria developed for Title I by the Office of Education include some basic principles which must be followed in planning a Title I project.

1. Projects must meet the special educational needs of educationally deprived children in school attendance areas having high concentration of children from low-income families.

2. Projects must be of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting those needs.

3. A Title I program should be part of an overall compensatory education program involving the use of resources from a number of programs and agencies.

4. The Title I program should support the regular school program and, if possible, change it.

5. The Title I program must be designed to <u>supplement</u> the regular district education program. It should <u>never supplant</u> any part of the district's responsibilities.

6. Parents should be actively involved in the Title I program. A strong effort should be made to organize effective district and local school PACs.

7. Evaluation procedures should be planned to be meaningful in terms of required state and federal reports, and for local management tools.

STATE ADVISORY GROUPS

The State Board of Education has established a permanent committee to serve in an advisory capacity to the Superintendent of Public Instruction with respect to the state administration of compensatory education programs as they relate to Title I, ESEA. The State Compensatory Education Advisory Committee is made up of thirteen members. The membership consists of educators and parents providing geographical and minority representation. Members are appointed to a three-year term of office by the State Superintendent of Public Instruction. Bylaws call for the election of a chairperson and a vice chairperson who serve in those capacities for a one-year term. The State Title I Coordinator serves as Executive Secretary.

The State Title I Office is also advised by three special state level committees:

- State Parent Advisory Committee
- State Evaluation Committee
- State Neglected and Delinquent Program Committee

Other special committees are called from time to time as the need for specific problem resolution arises.

ALLOCATION

The following allocation process is used to provide Title I funds to local districts. The regulations require that data utilized in this process come from several sources, none of which originates within the Oregon Department of Education. The data includes 1970 U.S. low-income census information, State Welfare (AFDC and Foster Home Children) and institutionalized neglected and delinquent children. These data are sent by each agency directly to the U.S. Bureau of Statistics who validates it for the U.S. Office of Education. The same data is sent by the agencies to the State Title I Office and the local distribution totals of formula children are compiled. This list is sent to all districts.

A similar list is used by the U.S. Office of Education to determine the final allocation for the state for any fiscal year. The State Title I Office receives a grant award which must then be converted to LEA allocations. Calculation of the grant for each LEA begins by dividing the state allocation by the number of formula children in the state to determine an amount per child. The amount per child is then applied to the count for each LEA. The "hold harmless" process assures that all LEAs receive no less than 85 percent of the previous FY allocation. Additional funds are added to any LEA allocation which fails to receive 85 percent in the first calculation. These LEAs, upon adding the funds needed to guarantee an 85 percent funding level, will have received their final grant for that fiscal year. Then the number of children and the funds involved in the "hold harmless" process are subtracted from the state total, yielding a new state dollar amount per child. The revised amount per child is applied to the count for each remaining LEA, resulting in a final allocation for each.

SIZE, SCOPE, AND QUALITY

Each program or project shall be of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting the stated needs of educationally deprived children. An applicant's total program should concentrate sufficient resources in relation to the number of educationally deprived children in the district to insure that the special educational needs of these children will be significantly reduced and that the help provided will not be fragmentary. For example, a remedial reading project might be so widespread that it covers much of the school district and expends too much of the allocation, and in so doing neglects other elements needed in the total program.

Size

Size should be considered in terms of the breadth and intensity of the impact on each child involved. A project might appear to be of considerable size in terms of cost, staffing, and so forth but might in fact be too small for the number and needs of the children it would serve. On the other hand, a far less costly project might be considered of sufficient size if it provided intensive services and extra education opportunities in considerable depth for the needs of a limited number of children.

Scope

The total program should include a variety of coordinated approaches toward meeting the needs of the educationally deprived children in a school district, insofar as funds permit. And it should be designed to meet the needs of these children whether they are in or out of school. Unless there are special reasons for concentration on certain grade levels, the program should be available to children at various grade levels.

Quality

A program or project would be of sufficient quality if it included the use of resources and methods that had been carefully selected to meet the special needs of educationally deprived children and if it gave grounds for reasonable expectation that it would be successful in meeting these needs.

See also paragraph 116a.22, Project Description, Size, Scope and Quality, Federal Register, vol. 41, no. 189.

COMPREHENSIVE STUDENT NEEDS ASSESSMENT

Each project must complete a comprehensive student needs assessment in the target schools, prioritize those student needs and write a program to meet the assessed educational needs of the students. How effectively these needs have been met should be evaluated.

Needs assessment should be viewed as "a system for determination of student needs . . . which will allow flexibility to accommodate varying local conditions." Data for the needs assessment must be collected from a variety of sources. Objective data may be collected from previous Title I evaluations, diagnostic testing, student records, previously identified students with unmet needs, etc. Subjective data sources include opinions of school officials and board, community people and leaders, parents, students, teachers and other knowledgeable persons.

Data must include information on public schools, private schools, preschool students and dropouts in the eligible attendance areas. Needs of children in local neglected and delinquent institutions must also be included.

The assessed needs of students must be compiled, summarized and prioritized. The Title I program must be written to serve these needs. From the information the district: 1) determines needs; 2) identifies grade levels to concentrate services; 3) writes measurable project objectives. The needs assessment summary must be attached to the Title I project application.

Each district should develop a plan to conduct a comprehensive student needs assessment for each project. A needs assessment cycle may be developed allowing the district to periodically focus on special needs or collect varying data, but each district must document the fact they have conducted a comprehensive student needs assessment to justify each project.

ADHERENCE TO THE LAW

All project applications and project operations under Title I of the Elementary and Secondary Act (ESEA) must be in accordance with federal law, state law, opinions of the attorney general, and rules and regulations of the State Board of Education. Approval of a project application by the State Title I Office does not release the local district from the ultimate responsibility for the legality of the program.

PUBLIC OWNERSHIP

The control of funds, title to property, and administration of the program shall be in a public agency. No Title I funds may be transferred by the receiving district to another public or private agency.

EQUIPMENT INVENTORY

LEAs are required to submit with each project application an inventory of all equipment purchased with previous year's Title I, ESEA project funds. A form for this purpose is included in the application.

This is discussed in greater depth on page 3, Part II.

EDUCATIONALLY DISADVANTAGED CHILDREN

For the purpose of this program, the term "educationally disadvantaged children" means those children in a particular school district who have the greatest need for special educational assistance in order that their level of educational attainment be raised to that appropriate for children of their age. The term includes handicapped children and children whose needs for special educational assistance are the result of poverty or cultural or linguistic isolation from the community at large.

Benefits are not limited to children presently enrolled in school. They also extend to children of preschool age; to those who have dropped out of school; and to children of migrant farm workers who, at certain times during the school year, may pass through some school districts in substantial numbers.

Clearly, not every child who fits into this classification is educationally disadvantaged to the same degree or in the same way. Some of these children will be severely deprived in many ways; it is upon them that the Title I projects should be focused.

As with any other group of young people, educationally disadvantaged children differ from one another. Each child is an individual with individual characteristics. But when these children are considered as a group, certain characteristics are discernible.

From the point of view of the teacher, the characteristics of an educationally disadvantaged child might be:

1. Lack of response to conventional classroom approaches.
2. Inadequate performance in communication skills.
3. Socially unacceptable behavior.
4. Indifference to responsibility.
5. Nonpurposeful activity.
6. Physical defects and poor health habits.

Further study reveals that:

1. He is overage for his grade.
2. His school attendance is poor.
3. He has a high rate of failure.
4. He has a high dropout rate.
5. His aspiration level is low.
6. He is without kindergarten experience.
7. He has low achievement in reading and in arithmetic.
8. His participation in cultural activities is negligible.
9. His potential appears to exceed what test data show.

It should be remembered that these are general characteristics and should not be considered as selection criteria.

GUIDELINES
EVALUATION OF TITLE I PROJECTS

Each application for a Title I project shall describe the procedures and techniques to be used in evaluating the effectiveness of the program in meeting the special educational needs of participating children. This must include performance criteria (measurable objectives) and the instruments and methods to be used to objectively measure changes in the educational achievement of children.

The evaluation must be carried out for each Title I project and the results returned to the State Office within 30 days following the end of the project.

Results should include the degree to which the projects have met the measurable objectives and the changes in educational achievement of the individual children. Achievement data must be collected by use of standardized achievement tests selected from the list of tests provided by the State Office. Data is also collected on the effectiveness of parent involvement, instructional in-services, support services, an unduplicated count of public and private school participants, the number and categories of staff, the nature and extent of in-service training, the ethnic background of participants, actual project expenditures and an impact summary. Completion of each item applicable to your project is necessary so the compilation of data is accurate.

Changes in educational achievement of children is usually collected on a pretest/post-test evaluation design except in instances in which the district has chosen to pilot one of the three USOE evaluation models or variations of one of the models.

Data from the district evaluation is compiled into a report and submitted to USOE by November 15 of each year.

COMPARABILITY

Legislation requires that a state educational agency shall not approve an application at a local educational agency for a grant of Title I, or make payments of Title I funds under a previously approved application at such agency, unless that local educational agency has demonstrated that services provided with state and local funds derived from public services in Title I areas are at least comparable to the services being provided with such state and local funds in schools serving attendance areas not designated as Title I project areas.

LEAs who have similar school types but also exhibit both Title I and non-Title I schools within those types, are required to submit Form 4524-b (the Comparability Report) and Form 4524-a (General Information). Data should be collected as of a date not later than November 1 of each fiscal year as specified by the state educational agency. To the extent practical, such data shall be the data nearest October 1 which similar data, such as enrollment data, are required for reports to the state educational agency.

The following data is gathered as of reporting date--usually October 1, for the Title I schools and compared with averages for non-Title I schools:

a. Number of pupils enrolled per FTE instructional staff (certificated and noncertificated). The number of children enrolled per instructional staff member for each public school serving a Title I project area can be no more than 105 percent of the average number of children per instructional staff member in all other public schools in the district.

b. Per pupil expenditure for staff salaries (excluding longevity). Longevity payments are to be listed for schools who are on the national sample. The annual expenditure per child for instructional salaries from state/local sources can be no less than 95 percent of such expenditure per child in all other public schools in the district.

Information in the Comparability Report (Form 4524-b) must be supported by sufficient data on file at the LEA to confirm that schools receiving Title I funds are funded by state and local funds at a level that is comparable to the average level for non-Title I schools. A district is considered noncomparable when there exists a variation in a Title I school that is greater than five percent when compared to the averages for all non-Title I schools. The information reported must be consistent with the data on the current application.

If any school serving a Title I project area is determined not to be comparable on the regular reporting date (usually October 1), the LEA must submit a revised comparability report by December 1 showing that comparability has been achieved.

The SEA is required, under Title I regulations, not to make further payments as of December 1, to an LEA who has not, as of that date, complied with comparability requirements in 45 CFR 116.26 and to notify such LEA that it

cannot legally obligate Title I funds after that date. Compliance with this requirement is subject to federal and state audit. The SEA has until December 31, 1975, to assemble data from all the corporations and to prepare reports requested by the USOE. Accurate and timely reports from LEAs will facilitate our efforts in meeting the commitments mandated by the Code of Federal Regulations (CFR). If the LEA has not filed a Comparability Report demonstrating comparability with the SEA and/or has failed to meet the comparability requirements by December 1, the federal legislation requires that the SEA suspend approval of the current application. The entitlements of LEAs who have not become comparable by March 31 shall be made available to other eligible LEAs for reallocation after March 31. See CFR 116a.26 (f) (3).

PUPIL SUPPORT SERVICES

Supporting services are those services which provide technical and personal support to facilitate and enhance instruction. Supporting services exist to sustain and enhance instruction, rather than as entities within themselves.

Supportive services are limited to children who are enrolled in a Title I instructional activity and who demonstrate a need for that service as documented in a needs assessment. To receive supportive services, a child must first be in the instructional phase of the program. For example, a child who is in a Title I reading or math program may receive a health service that is supplied with Title I funds.

Support activities that are usually considered to be related to basic instruction are:

Attendance and Social Work
Guidance
Health
Psychological
Speech Pathology and Audiology
Transportation

These services are found in the chart Program Structure for Oregon School Districts, (Rev. 11-74) which is found in the Appendix.

Nutritional services are found in the Application Criteria in Part I but these services are more appropriately funded through Department of Agriculture programs.

The State Title I Office is responsible for the final approval of support activities and must be assured by the applying district that an adequate assessment of needs justifies the use of support services in a project; that services will be planned so supplanting of services do not occur; and that all other available resources have been investigated.

PROJECT STAFF

The ratio of project staff to the number of children to be served should be high enough to provide concentrated, individualized services. Use should be made of a variety of personnel other than professional classroom staff. Parents of participating children, volunteers and persons in the community with special skills should be considered in the selection of the staff needed to provide the specified services.

Before submitting a project, the following areas must be thoroughly explored:

1. Personnel employed for positions in Title I projects must meet state certification for the type of work to be performed.

2. School districts must be reasonably assured that the necessary personnel will be available for the period of the project.

3. Regular staff members assigned to Title I projects requiring their release from regular duties must be replaced by the district. At no time may Title I funds be used to supplant district funds.

Teachers and other staff may receive compensation in excess of their contracted salary if they are assigned additional responsibilities necessitating additional time assignments beyond those for which they already have been contracted to perform.

Salaries for teachers and aides employed in the Title I program should conform to the adopted district salary schedule for the positions they hold. There is no justification for paying these staff members on a different schedule than the regular district staff.

Limitations of Use of Teacher Aides

As teacher aides are beginning to play an ever increasing role in the formation of Title I programs, project applicants should be aware of the regulations concerning the employment and use of these staff members, as noted above. Salaries for aides should conform to the adopted district salary schedule for aides. In the absence of a salary schedule for aides, the district should be guided by the state average pay for teacher aides. Also refer to the State Board of Education regulation for the employment of teacher aides by Oregon school districts.

The district should be very careful in assigning aide responsibilities:

1. Aides should not be allowed to take charge of class activities without the direct supervision of a certified teachers. Supervision by a principal is not acceptable unless the principal can actually provide the close personal supervision required by the State Board of Education guidelines.

2. Aides shall never be used as substitute teachers, to relieve teacher overload or fill in the case of teacher absence. This is a trap districts

can easily fall into and should be avoided. Not only is this illegal from a certification view, but it is also illegal according to Title I regulations. Persons employed with Title I dollars should not be assigned to district activities.

Some aides have Oregon State certification but are employed as aides. If they have been employed as aides, they require supervision from a certificated, so employed teacher.

Salaries Funded by More Than One Fund Source

Each position funded by Title I is justified on the basis of program needs. These needs should be reviewed annually to determine whether they continue to exist. On occasion, an LEA may consider funding a position partially by local resources and partially by Title I. In this event, a time distribution record must be maintained to show that the amount of time spent in Title I activities is commensurate with the percentage of salary being borne by Title I. This requirement prevails for supervisory, other professional and nonprofessional positions. School superintendents and office managers cannot be reimbursed by Title I funds since these positions are contracted for the entire year and are fully supported by local funds.

On the other hand, if an elementary school principal has a regular contract of ten months, he could negotiate a supplementary contract of one or two months for the express purpose of administering the Title I project for the summer.

Avoiding General Aid

It must be demonstrably clear that if Title I funds are to be used to support staff positions, then this arrangement must result in additional staff time beyond what is provided by local funds. Further, the additional services provided thusly cannot have been previously provided by local funds. General aid positions cannot be supported by Title I funds; i.e., librarians, media specialists, playground supervisors, teachers in regular classrooms, cafeteria personnel, etc.

It is sometimes too easy to use a Title I funded teacher as a substitute when regular staff are absent. This is clearly a violation of Title I regulations as Title I then is placed in the position of paying for general fund responsibilities. A second point is that the Title I program is deprived of its continuity.